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Attorneys for Petitioner

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

KIPLAND KINKEL,

Case No.: 6:11-cv-6244-AA

Petitioner,

v.

DECLARATION OF
THADDEUS BETZ

GERALD LONG, Superintendent,
Oregon State Correctional Institution,

Respondent.

I, Thaddeus Betz, declare and say:

1. I represent petitioner, Kipland Kinkel, in the above-captioned case.
2. The reply brief to Respondent's Responses to Petition for Writ of Habeas

Corpus (Dkt. No. 20, Dkt. No. 103) is due on or about March 15, 2021 (Dkt. No. 124).

3. In drafting that reply, in order to adequately and completely brief the merits of Petitioner's claims, I will need up to 95 pages in order to do so, excluding index and exhibits.

4. This case involves a lengthy sentencing proceeding, a direct appeal, two separate state court collateral proceedings involving complex legal issues and factual background. I have attempted to be concise but require more pages than L.R. 7-2(b) permits.

5. I contacted respondent's attorney, Samuel A. Kubernick, and he does not object to this motion, so long as petitioner does not object to the filing of a response to the reply, if requested.

6. Therefore, petitioner respectfully requests leave to file an extended reply of up to 95 pages, excluding the index and exhibits.

DATED: February 25, 2021

Respectfully submitted,

S/ THADDEUS BETZ
THADDEUS BETZ OSB #062745
Attorney for Petitioner